

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

The City of Buffalo,	)	
	)	
Plaintiff,	)	
	)	Case No. 23-CV-66-FPG
v.	)	
	)	
Smith & Wesson Brands, Inc., <i>et al.</i> ,	)	
	)	
Defendants.	)	
The City of Rochester,	)	
	)	
Plaintiff,	)	
	)	Case No. 23-CV-6061-FPG
v.	)	
	)	
Smith & Wesson Brands, Inc., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW AS ATTORNEYS FOR DEFENDANT POLYMER80, INC.**

John Parker Sweeney, James W. Porter, III, Connor M. Blair, and the law firm of Bradley Arant Boult Cummings, LLP (“Attorneys”) move to withdraw as attorneys of record for Polymer80, Inc. (“Polymer80”), pursuant to Western District of New York Federal Civil Local Rule 83.2(c)(4).

Defendant Polymer80 has failed to fulfill its obligation to pay the Attorneys for their services in this case. The Attorneys request to withdraw to avoid an unreasonable financial burden. The Attorneys have taken steps reasonably practicable to protect the client’s interests. The Attorneys have given Polymer80 reasonable notice of their intent to withdraw allowing it time for employment of other counsel and have advised it to have another attorney enter an appearance.

After notification, Polymer80 has given written consent to the Attorneys' withdrawal. A true and accurate copy of Polymer80's consent is attached as **Exhibit 1**.

These consolidated cases are in their early states and have been stayed pending the Second Circuit's resolution of *National Shooting Sports Foundation, Inc. v. James*, No. 22-1374. Allowing withdrawal of the Attorneys will not prejudice Polymer80, Inc. nor delay these proceedings.

### **CONCLUSION**

For the foregoing reasons the Attorneys respectfully request that this Court enter the proposed order granting withdrawal and striking their appearances as attorneys for Defendant Polymer80, Inc.

Respectfully submitted,

/s/ John Parker Sweeney  
John Parker Sweeney  
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Connor M. Blair  
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*Attorneys for Defendant Polymer80, Inc*

**CERTIFICATE OF SERVICE**

I, herby certify that, on February 9, 2024, the foregoing MOTION TO WITHDRAW AS ATTORNEYS FOR DEFENDANT POLYMER80, INC. was filed and served by electronic submission via the Court's CM/ECF system upon all counsel of record.

/s/ John Parker Sweeney \_\_\_\_\_  
John Parker Sweeney